

Sage Legal LLC

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February 5, 2026

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. James R. Cho, U.S.M.J.
225 Cadman Plaza East, Courtroom 11D
Brooklyn, NY 11201-1804

Re: Graziano, *et ano* v. MBLIC Motors LLC, *et ano*
Case No.: 1:25-cv-2943 (NGG) (JRC)
Consent Letter Motion to Adjourn Conference

Dear Judge Cho:

This firm represents the Defendant MBLIC Motors LLC d/b/a Empire Cadillac (hereinafter the “Defendant” or the “Dealership”) in the above-referenced case. Defendant writes to respectfully request a one (1) week extension of time to respond to Plaintiffs’ first amended complaint.

Pursuant to ¶ C(2) of this Court’s Individual Practices, Defendant respectfully submits that:

- (i) the original deadline to respond fell on February 4, 2026;
- (ii-iii) there has been no previous request for an extension of this particular deadline;
- (iv) The Dealership was unable to sooner contact Plaintiff for his position.
- (v) The Dealership does not believe this request affects any other scheduled Court appearance or deadline.

The reason for the request is because your undersigned has been focused on submitting opposition papers to a combined motion to certify a class and collective action in the matter of Fernandez v. Bulldozer Hospitality Group, Inc., *et al.*; Case No.: 1:25-cv-4490 (AS) (GS) and attended two (2) all day mediations in two (2) separate cases pending in the United States District Courts for the Northern District of Florida and the Eastern District of Missouri on Monday, February 2, 2026 and Wednesday, February 4, 2026. Defendant respectfully submits that, in light of these extensive engagements, good cause and excusable neglect exists to permit this Court to exercise its discretion in favor of granting the brief extension sought here. See Fed. R. Civ. P. 6(b)(1)(B). Moreover, Plaintiff’s amended complaint has joined a new Defendant that has not yet appeared in this case.

Accordingly, the Dealership’s motion for an extension of time should be granted. Defendant thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
February 5, 2026

Respectfully submitted,
SAGE LEGAL LLC
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